

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, et al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

RE: This filing relates to the
Commonwealth and Claim No. 74306

**URGENT CONSENTED MOTION FOR EXTENSION OF DEADLINES TO FILE A
RESPONSE TO FIVE HUNDRED EIGHTY-FIFTH OMNIBUS OBJECTION AS TO
CLAIM 74306**

To the Honorable United States District Judge Laura Taylor Swain:

COMES NOW, **O'Neill Security & Consultant Services, Inc.** (hereinafter "O'Neill"), and respectfully submits this urgent consented motion (the "Urgent Motion") for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), extending by thirty (30) days, to and including Wednesday, September 13, 2023, the deadline to file a response to Commonwealth of Puerto Rico (the "Commonwealth" or the "Debtor") *Five Hundred Eighty-Five Omnibus Objection (Substantive) of the*

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Commonwealth of Puerto Rico to Claims that are Partially Satisfied and/or Partially Assert Amount for Which the Debtor is Not Liable [Docket No. 24763] (the “585 Omnibus Objection”). The appearing party has conferred with counsel for the Debtor, who consents to this request.

Background

1. On July 14, 2023, the Commonwealth filed the 585 Omnibus Objection [Doc. No. 24763], seeking to modify and allow several proofs of claim that allegedly are partially satisfied and/or partially assert amounts for which the Debtor is not liable, including claim number 74306.

2. The deadline for O’Neill to respond to the 585 Omnibus Objection is August 14, 2023, at 9:30 AM, and the Hearing is scheduled for August 30, 2023, at 4:00 PM.

Request for Relief

3. O’Neill continues to work to gather, review, and assess information necessary to assess the 585 Omnibus Objection and to file a response to the Objection. O’Neill conferred with the Commonwealth’s counsel, who consented to the requested extension.

4. Accordingly, O’Neill, with the Commonwealth’s consent, proposes the following extensions of the deadlines set forth in the Scheduling Order:

- O’Neill’s deadline to respond to the 585 Omnibus Objection shall be extended by thirty (30) days, from August 14, 2023, to **September 13, 2023**.

Certification of Compliance with Local Rule 9013-1 and the Seventeenth Amended Case Management Procedures

5. Pursuant to Paragraph I.H of the *Seventeenth Amended Notice, Case Management and Administrative Procedures* [ECF No. 24726-1] (the “Case Management

Procedures”), O’Neill hereby certifies that it has carefully examined the matter and concluded that there is a true need for an urgent motion; it has not created the urgency through any lack of due diligence; it has made a bona fide effort to resolve the matter without a hearing; it has made reasonable, good-faith communications with the Commonwealth in an effort to resolve or narrow the issues that are being brought to the Court, and the Commonwealth consents to the relief requested herein.

WHEREFORE, it is respectfully requested that this Honorable Court enter the Proposed Order and grant the extension of time requested with any other remedy deemed just and proper.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In Ponce, Puerto Rico, this 11th day of August 2023.

s/Elías L. Fernández Pérez
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